

April 17, 2016

Via UPS Ground Delivery

Mindy Anthony
Delaware Department of Natural Resources & Environmental Control
Division of Waste and Hazardous Substances
Solid and Hazardous Waste Management Section
89 Kings Highway
Dover, DE 19901

RE: Final Documentation Related to the Resource Recovery Facility Permit Renewal Application for Gold Medal Environmental of DE, LLC ("Gold Medal"), 1000 South Heald Street, Wilmington, New Castle County, Delaware; Permit No. SW-03C17

Dear Ms. Anthony:

Compliance Plus Services, Inc. ("CPS") is pleased to submit the enclosed Resource Recovery Facility Permit renewal application final documentation, on behalf of our client, Gold Medal Environmental of DE, LLC ("Gold Medal"), for the operation of the Resource Recovery Facility ("RRF") referenced above.

The enclosed documentation is being provided in a clean format with no redline/strikeout formatting as requested in your April 4, 2017 electronic mail delivery.

Enclosed, please find one (1) original and two (2) copies of this final Resource Recovery Facility Permit application documentation. Additionally, as required, we have included an electronic version on a compact disc of the entire permit renewal application submission in final format.

If you have any questions or concerns regarding this submittal, please do not hesitate to contact me at 215.734.1414 or via electronic mail at mlogan@cps-2comply.com.

Sincerely

Michael D. Logan

Vice President, Environmental Services

Compliance Plus Services, Inc.

Enclosure

cc: James Sage, Gold Medal Environmental of DE, LLC

N:\LETTERS\5800-5899\5869 - GOLD MEDAL SUBMITTAL OF FINAL RR PERMIT RENEWAL DOCUMENTATION - CLEAN COPIES APRIL 2017.DOCX



December 8, 2016

Via UPS Ground Delivery

Mindy Anthony
Delaware Department of Natural Resources & Environmental Control
Division of Waste and Hazardous Substances
Solid and Hazardous Waste Management Section
89 Kings Highway
Dover, DE 19901

RE: Response to November 4, 2016 Technical Comments Regarding the Resource Recovery Facility Permit Renewal Application for Gold Medal Environmental of DE, LLC. ("Gold Medal"), 1000 South Heald Street, Wilmington, New Castle County, Delaware; Permit No. SW-03C17

Dear Ms. Anthony:

Compliance Plus Services, Inc. ("CPS") is pleased to submit the enclosed response to the Department's November 4, 2016 comments on the Resource Recovery Facility Permit renewal application, on behalf of our client, Gold Medal Environmental of DE, LLC. ("Gold Medal"), for the operation of the Resource Recovery Facility ("RRF") referenced above.

The enclosed response document includes the Department's comments restated in bold in the order they were presented in the November 4, 2016 e-mail and the Gold Medal response in italicized text below it. The applicable revised pages of the application document are enclosed in redline/strikeout to showchanges from the original submission.

Enclosed, please find one (1) original and two (2) copies of the comment response for the Resource Recovery Facility Permit Application. Additionally, as required, we have included an electronic copy of the response submission.

If you have any questions or concerns regarding this application please do not hesitate to contact me at 215.734.1414 or via electronic mail at mlogan@cps-2comply.com.

Michael D. Logan

Vice President, Environmental Services

Compliance Plus Services, Inc.

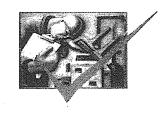
Corporate Consultant to the Clean Earth Companies

Enclosure

cc: James Sage, Gold Medal Environmental of DE, LLC

N:\LETTERS\5700-5799\5747 - GOLD MEDAL RESPONSE TO RESOURCE RECOVERY PERMIT RENEWAL APPLICATION COVERLETTER
DEC. 2016 DOCX





September 30, 2016

Via UPS Ground Delivery

Nancy C. Marker, Administrator
Delaware Department of Natural Resources & Environmental Control
Division of Waste and Hazardous Substances
Solid and Hazardous Waste Management Section
89 Kings Highway
Dover, DE 19901

RE: Submission of Resource Recovery Permit Renewal Application for Operation of Resource Recycling Facility ("RRF") for Gold Medal Environmental of DE, LLC. ("Gold Medal"), 1000 South Heald Street, Wilmington, New Castle County, Delaware; Permit No. SW-03C17

Dear Ms. Marker:

Compliance Plus Services, Inc. ("CPS") is pleased to submit the enclosed Resource Recovery Permit renewal application, on behalf of our client, Gold Medal Environmental of DE, LLC. ("Gold Medal"), for the operation of the Resource Recovery Facility ("RRF") referenced above. Gold Medal's current permit approval allows the facility to accept source separated and single stream recyclable materials and C&D materials for bulking and transfer offsite. The enclosed application is intended to renew the current approval and includes several modifications for additional storage and processing areas as well as some requested changes to the permit administrative procedures.

Please note that Gold Medal is not proposing any changes in the types of material or daily throughput tonnage to be managed at the facility. This renewal application does propose the following changes:

- Addition of a third baler and minor reconfiguration of baler locations, processing and storage areas within Process Building No. 1;
- Addition of a covered shipping pad for the management of outbound commodities;
- Addition of a proposed covered pad for the receipt of C&D materials;
- Additional single stream recyclable material processing to be located in an existing structure along the northern portion of the facility property (Process Building No. 2);
- Addition of a second vehicle weighing scale and associated traffic flow modifications;
- Revised material and equipment storage layout for the site;
- Modification of the record-keeping requirements; and,
- Increase in the allowable Out-Throw percentage for C&D recyclable materials.

Nancy C. Marker, DNREC Gold Medal Environmental of DE, LLC Resource Recovery Permit Application September 30, 2016 Page 2 of 2

Enclosed, please find one (1) original and two (2) copies of the Resource Recovery Permit application binder. Additionally, as required, we have included an electronic copy of the entire permit application for the Department's use.

If you have any questions or concerns regarding this application please do not hesitate to contact me at 215.734.1414 or via electronic mail at mlogan@cps-2comply.com.

Sincerely,

Michael D. Logan

Vice President, Environmental Services

Compliance Plus Services, Inc.

Corporate Consultant to the Clean Earth Companies

Enclosure

cc: James Sage, Gold Medal Environmental of DE, LLC

N:\LETTERS\5600-5699\5696 - GOLD MEDAL RESOURCE RECOVERY PERMIT RENEWAL APPLICATION COVER LETTER SEPT. 2016.DOCX

Resource Recovery Permit Renewal Application



Resource Recovery Facility

Originally Submitted September 2016; Revised December 2016; Final Update - April 2017

Gold Medal Environmental of DE, LLC 1000 S. Heald Street Wilmington, DE 19801

Project No.: 0338.1015.02

Prepared By:
Compliance Plus Services
455 Business Center Drive, Suite 250
Horsham, PA 19044
215.734.1414

Gold Medal Environmental of DE, LLC

1000 S. Heald Street Wilmington, DE 19801

Resource Recovery Permit Renewal Application

(Originally Submitted September 2016; Revised December 2016; Final Update – April 2017)

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Checklist for Persons Applying for a Permit (or Renewal) to Construct and/or Operate a Resource Recovery Facility

Section 1 - Solid Waste Management Facility Application

Section 2 - Public Notice Fee

Section 3 - Property Lease Agreement

Section 4 - General Operations Plan – Materials Recovery Facility

Attachment I – Maps and Drawings

Attachment II – Recyclable Market Information and Data for Single

Stream Recyclables

Attachment III - Contingency Plan and Emergency Response

Procedures

Attachment IV - Gold Medal Environmental of DE, LLC July 17,

2015 Resource Recovery Facility Permit

No. SW-03C17

Attachment V - Process Flow Diagram

Attachment VI - Daily Facility Inspection Report

Attachment VII - Forms and Documentation for Procedures for Pre-

Qualification and Acceptance of Suspected Asbestos-Containing Materials (i.e., Asphalt

Shingles/Drywall)

Section 5 - Engineering Report

Attachment I - Maps and Drawings

Attachment II - List of Processing Equipment
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Attachment IV - Construction Schedule for Facility Improvements

Section 6 - Recycling Analysis

Gold Medal Environmental of DE, LLC Resource Recovery Permit Renewal Application Table of Contents Final Update – April 2017 Page 2 of 2

Exhibit 1 - Table of End Market Users

Section 7 - Plan for Sampling and Disposition of Residuals

Section 8 - Hydrogeological Assessment

Exhibit 1 - April 21, 2010 DNREC Approval of March 29, 2010 Remedial Action Completion Report

Section 9 - Environmental Assessment

Exhibit 1 - Correspondence from State of Delaware Natural Heritage and Endangered Species Program

Exhibit 2 - Highway Traffic Map

Section 10 - Site Maps and Drawings

• Site Location Map

- Aerial Photograph
- Topographic Map
 - CPS Drawing T-02, Topographic Features Map, dated November 21, 2016
- Flood Insurance Rate Map
- CPS Drawing No. SP-1 Site Plan
- CPS Drawing No. SP-2 Process and Storage Area Location

Section 11 - Zoning Approval

Section 12 - Closure Plan

Attachment I - Conceptual Closure Cost Summary Table

Section 13 - Financial Assurance

Section 14 - Siting Requirements

Section 15 - Environmental Permit Application Background Statement



CHECKLIST FOR PERSONS APPLYING FOR A PERMIT (OR RENEWAL) TO CONSTRUCT AND/OR OPERATE A RESOURCE RECOVERY FACILITY

The attached application will not be processed unless all of the following information is provided by the applicant. The following checklist is based upon the specific requirements contained in the Delaware Regulations Governing Solid Waste (DRGSW). Please complete this checklist by placing a check mark before each included item and submit along with the completed application to the address below. The applicant must submit 3 copies of the completed application package as well as an electronic version suitable for distribution and posting on the DNREC website.

Department of Natural Resources and Environmental Control Solid & Hazardous Waste Management Branch 89 Kings Highway Dover, DE 19901

